



MID CENTURY TELEPHONE COOPERATIVE™

285 Mid Century Lane • PO Box 380 • Fairview, IL 61432

Phone:(309) 778-8611 • Fax:(309) 783-3297

Certification of Annual 47 C.F.R. § 64.2009 (e) CPNI Filing, EB Docket 06-36

Paper filing mail to:

Received & Inspected

All Federal Communications Commission
 Marlene H. Dortch
 Office of the Secretary
 9300 East Hampton Drive
 Capitol Heights, MD 20743

JAN 27 2009

FCC Mail Room

Deliver certifications to:

1 Original and four copies:
 Marlene H. Dortch
 Office of the Secretary
 Federal Communications Commission
 445 12th Street, SW, Suite TW-A325
 Washington, D.C. 20554

1 Copy:
 Best Copy and Printing, Inc.
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 Washington, D.C. 20554

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January 26, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**Re: Certification of Annual 47 C.F.R. § 64.2009(e) CPNI Filing, EB Docket 06-36
Mid Century Telephone Cooperative, Inc., February 27, 2009**

Dear Ms. Dortch:

Attached please find Mid Century Telephone Cooperative's Certification of CPNI Filing and the accompanying descriptive statement of how Mid Century's CPNI procedures and actions ensure that Mid Century is in compliance as required by Section 64.2009 of the Commission's Rules.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "A.J. Harland", written over a horizontal line.

A.J. Harland
President

Attachments

cc: Best Copy and Printing, Inc.



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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for: **2008**

Date filed: **January 26, 2009**

Name of company covered by this certification: **Mid Century Telephone Cooperative, Inc.**

Form 499 Filer ID: **808473**

Name of signatory: **A.J. Harland**

Title of signatory: **President**

I, **A.J. Harland**, certify that I am an officer of the company named above, and acting as agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that Mid Century Telephone is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Mid Century Telephone has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Mid Century Telephone has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____

A handwritten signature in cursive script, appearing to read 'A.J. Harland', is written over a horizontal line.
A.J. Harland

Attachments

**Customer Proprietary Network Information (CPNI)
Statement of CPNI Compliance
Annual 47 C.F.R. §64.2009(e) CPNI Certification
EB Docket No. 06-36**

Annual Certification Processes Summary

Certification Year 2008

Reference MCTC CPNI Policies and Procedures Manual Section VII. Annual Certification

The Statements below describe the procedures and actions taken to ensure that Mid Century is in compliance with the FCC's CPNI Rules

A. Employee CPNI Training	In addition to comprehensive CPNI training conducted in 2007, Mid Century continues to be proactive in ensuring its employees are properly updated and trained in procedures related to CPNI. Electronic safeguards for customer online account access and online account change notification was implemented June 6, 2008 in accordance with FCC compliance. Also, in 2008, focus of CPNI extended into Red Flag rules. Mid Century created and implemented a detailed Red Flag ID Theft Program. This Program broadens awareness of CPNI issues and strengthens awareness of ID Theft. Employee training is documented and properly retained.
B. Disciplinary – Improper Disclosure of CPNI	There were no CPNI employee infractions for 2008.
*C. Process for Opt-in and Opt-out	MCTC markets to its customers using the Opt-out approach, when applicable. MCTC does not participate in 3 rd party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, an Opt-out letter and Opt-out form are required to be mailed to customers every 2 years. Mid Century's scheduled mailing of these documents is December 2009. Mid Century will also mail these notification documents to customers when it or its affiliate companies runs certain sales or marketing campaigns. There were no applicable sales or marketing campaigns for 2008. Occasionally, a CEI representative may ask the customer for oral consent to

	<p>use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone services to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services.</p> <p>Detailed comments are noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.</p>
D. Actions taken against data brokers (Pretexters)	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2008.
E. Pretexters process(es) – attempt to access CPNI	No known access to CPNI by Pretexters (breaches) was reported for the year 2008.
F. Customer Complaints – Unauthorized release of CPNI	No customer complaints were received as a result of unauthorized release of CPNI for the year 2008.
G. Process to ensure Opt-out elections are recorded & followed	<p>Customers may call our business office, or our 24/7 voicemail CPNI line, come in to one of our business office locations, e-mail us, utilize the Opt-out form that is mailed to the customer, or access the form on our website in order to deny or approve our use of the customer's CPNI to offer products or services not related to the telephone services to which the customer currently subscribes. Service order and Customer Service Representative procedures and processing are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or un-restrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.</p> <p>Access to customer CPNI is limited to authorized personnel and restriction pass codes are used to facilitate safeguard assurance. Release of call detail information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly</p>

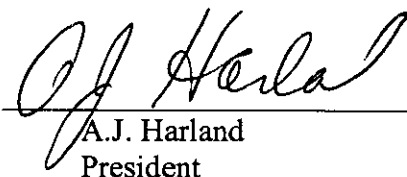
	<p>practiced on a daily basis.</p> <p>Enhancements to Mid Century's customer online account access provide that a customer service representative authenticate, register, and provide system-generated passwords to customers seeking online access. Additionally, incorporated into the online system, a prompt is sent through to the billing system in a process to send customer notification letters for online account changes when applicable.</p> <p>Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.</p>
H. Other CPNI Compliance measures	<ul style="list-style-type: none"> ❖ Implemented Red Flag ID Theft Program ❖ Restricted certain billing system screen access to customer proprietary information to unauthorized personnel. ❖ Strengthened customer labeling protections to safeguard customer name/telephone/member# for marketing and other mailings. ❖ Implemented a company-wide policy to require any and all access to member/customer accounts to be documented. ❖ Implemented safeguards to the credit card system by assigning individual login/passwords, added virus protection & firewall to the dedicated credit card computer.

***Mid Century will honor any customer CPNI elections it receives by recording the restriction or non-restriction to the company and to its affiliate companies, Century Enterprises, Inc. and Cen-Satt, Inc., customer account record.**

Form 499 Filer ID: 808473

Date Filed: January 26, 2009

Signed: _____


A.J. Harland
President